

Otho A. Toms
and Herman S. Toms

On Petition

No. 17992 Equity

In the Circuit Court
for Frederick County,
Maryland

To The Honorable, The Judges of said Court.

The answer of Irving Toms to the petition filed in the above-entitled case on February 18, 1955, respectfully shows:

1. He admits the allegations of the first paragraph of said petition.

2. He admits the allegations of the second paragraph of said petition.

3. Answering the third paragraph of said petition, this respondent says that he has no knowledge of the allegations contained therein, and is, therefore, unable to answer the same.

4. Answering the fourth paragraph of said petition, this respondent says that his father, H. Clyde Toms, desires to have a survey made of the property which his said father purchased from Sheridan Toms on September 15, 1954, at public sale, as his said father believes the area of parcel No. 1 is twenty-five (25) acres more or less, instead of thirty-five (35) acres and sixty-three (63) square perches, more or less, as stated in the deed dated September 2, 1913, from Arthur D. Willard, Trustee, to Sheridan Toms and Olevia C. Toms, his wife, and recorded in Liber H. W. B. 306, folio 251, one of the land records of Frederick County, Maryland.

5. Answering the fifth paragraph of said petition, this respondent says that he is willing to settle for said real estate on March 19, 1955.

6. Answering the sixth paragraph of said petition, this respondent says that he has no knowledge of the allegations therein contained, and is, therefore, unable to answer the same.

And as in duty bound etc.

Walter E. Sinn
Solicitor for Irving Toms,
Respondent

Irving Toms
(Irving Toms) Respondent